

**From:** Rand Crafts  
**To:** Milka Radulovic  
**Date:** Sunday, March 30, 2003 1:10 PM  
**Subject:** IPP NOI

Milka,

Thank you for your comments. I appreciate your efforts in helping us clarify our meaning. Let me affirm for you our intent and answers to those questions you had.

-Surface area changes to the boiler will be in the superheat platen section (radiant) INSTEAD of the convection pass reheats.

-The replacement or rebuild of low NOx burners will not cause any increase in emissions.

-The induced fan power drive project is just being prepared to go out for bid. It will allow two vendor options: a bid only for power drives that will match our current motors, or a bid for matched power drive and motor replacement sets. The specifications require motors to be at least 7,500 hp nominal (to meet what we currently have) not to exceed 8,500 hp (in case an exact match is not available). The final design will depend upon the successful bidder. As described in the NOI, we have no intent of increasing capacity of the fans, the fans themselves will not be replaced, and whatever we get must balance with the existing equipment and design flows (i.e., match FD fan flows for furnace pressure balance).

-The modeling for CO used 2 hour averaged inputs of 0.263lb/mmBtu at full design heat input of 9,225 btu/hr. This may be appropriate for an 8 hour CO limit when there is also an annual cap on emissions.

-The intent of the second paragraph on page 6 is to indicate that no new NOx limit is required for approving the NOI. It is a statement concerning NOx, and has no bearing on good combustion practices. It is not in conflict with BACT for CO, as good combustion is antithetical to low NOx values. BACT means that we will manage combustion to limit CO emissions when NOx is actually being minimized by overfire air. But there is not an regulatory requirement to minimize NOx below current permit limits, and we do not feel that there is any requirement to change this in the new permit, as it has no bearing on the PSD permitting of CO.

The ultimate permitting timeline is of course dependent upon both OFA testing results, and the Title V renewal.

I will be back in the office on Tuesday if you have any questions. Thanks

Rand Crafts  
Intermountain Power Service Corp  
rand-c@ipsc.com

435-864-6494

435-864-0994 Fax